UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

September 16, 2008

Dave Lacey, Project Manager
Oregon Department of Environmental Quality
2020 Southwest Fourth Avenue, Suite 400
Portland, Oregon 97201-4987

Re: EPA Recommendations for Groundwater Dioxin Sampling at the Rhone Poulenc Site in Portland, Oregon.

Dear Mr. Lacey:

EPA is sending this letter in response to our phone call on April 30, 2008, and as a follow-up to EPA's letter dated April 14, 2008, regarding EPA Review and Comments on "Evaluation of the Usability of Groundwater Dioxin Data below the EPA Method 1613B Minimum Level, Rhone Poulenc – Portland Site" by AMEC for SLLI. Specifically, this letter is providing EPA's recommendation for further groundwater dioxin sampling to address the nature and extent of dioxin contamination at the Rhone Poulenc Site in Portland, Oregon.

First, an agreed upon ML and action level should be established for this site. There should be agreement from EPA and DEQ on these criteria and they should be consistent with the ARARS, PRGs, and RAOs for the Portland Harbor Superfund Site. EPA suggests that the ML used by the Lower Willamette Group in their Quality Assurance Project Plan should be used for consistency.

Second, before obtaining any samples, a thorough understanding of tidal and seasonal influences by measuring water levels in monitoring wells must be conducted because sample concentrations can be influenced by tidal flows (e.g., high concentration when tide is seaward and low concentration when tide is landward) and seasonal water tables (source material may be above water table and not released in one season and below water table and released in another).

Lastly, sampling for dioxin in groundwater at this site should be conducted using low flow techniques and high volume sampling similar to that conducted by the Lower Willamette Group for the Portland Harbor Remedial Investigation to obtain low detection limits. The high volume sampling technique is discussed in the Portland Harbor RI/FS Round 2A Surface Water Field Sampling Plan (Integral, 2006) and the Portland Harbor RI/FS Round 3A Field Sampling Plan Surface Water Sampling (Integral, 2008). It is also important to obtain enough sample volume since the ML is also dependent on the sample size.

If you have any questions or would like to discuss the contents of this letter further, please feel free to contact me at (206) 553-6705.

Sincerely,

Kristine Koch
Remedial Project Manager
Portland Harbor Superfund Site

cc: Jim Anderson, ODEQ-NW
Matt McClincy, ODEQ-NW
Rene Fuentes, EPA-OEA